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 6 ATTORNEYS FOR WASHOE COUNTY  
 7 DEFENDANTS

8 **UNITED STATES DISTRICT COURT**

9 **DISTRICT OF NEVADA**

10 \* \* \*

11 DREW RIBAR, Case No. 3:24-CV-00526-ART-CSD

12 Plaintiff,  
 vs.

**EMERGENCY MOTION FOR  
 RESTRAINING ORDER AGAINST  
 PLAINTIFF'S HARASSMENT**

13 WASHOE COUNTY, et al.

14 Defendants.

15 /

16  
 17 Defendants Washoe County, Washoe County Library System (“Library”), Jeff Scott  
 18 (“Director Scott”), Stacy McKenzie, Jonnica Bowen, Jennifer Cole, Deputy “Rothkin”  
 19 (Rothgeb), Deputy Sapida, and Sgt. Gomez (the original “County Defendants”) by and  
 20 through counsel, hereby move this Court for a restraining order on an emergency basis to  
 21 protect defense counsels. This Motion is based upon the following Memorandum of Points  
 22 and Authorities and all pleadings and papers on file.

23 **MEMORANDUM OF POINTS AND AUTHORITIES**

24 **I. INTRODUCTION**

25 County Defendants and counsel files the instant Motion for Temporary Restraining  
 26 Order, renewing its existing motion (ECF No. 140) on an emergency basis based on Plaintiff  
 27 Drew Ribar (“Ribar”)’s continued and escalating harassment, intimidation, menacing, and

1 inappropriate behavior toward counsel that is causing substantial mental harm. *See* Ex. 1.  
2 Ribar is currently on a scorched-earth defamation campaign against counsel, publicly  
3 calling them liars, calling for undersigned counsel to be fired, calling for the State Bar to  
4 investigate counsels, and calling for the Attorney General and acting U.S. Attorney for the  
5 District of Nevada to investigate their conduct. He recently filed a Bar complaint against  
6 counsels. *See* (ECF No. 171). More frightening, he shouted at counsel on the courthouse  
7 walkway after a hearing in this case on October 15, 2025. His conduct has caused counsel  
8 to experience an increase in anxiety, panic attacks, and fear for her personal safety. The  
9 behavior is completely inappropriate for the instant civil case.

10 Ribar has also directed inappropriate behavior toward the Defendants and  
11 representatives or employees of some of the Defendants. He used obscene language to a  
12 Library Board of Trustees (“LBOT”) Trustee to incite her and later attempted to follow  
13 members of the public to their vehicle with the express stated purpose of recording their  
14 license plate in the parking lot of a Washoe County Library branch. It is unclear whether  
15 Ribar’s vehicle towing company provides him access to any databases that would provide  
16 him home addresses of individuals associated with a license plate, giving rise to additional  
17 anxiety and fear. Ribar has gone uninvited to the workplaces of some Build Our Center  
18 representatives, and witnesses believe he was present at their counsel’s office. Disturbingly,  
19 he posted details on YouTube regarding the name and workplace of the fiancé for one of  
20 those individuals. His tactics deter the fair administration of this case, oppress Library  
21 operations, and harass the individuals involved.

22 Additionally, Ribar has expressed alarming beliefs that County Defendants fear he  
23 will use to justify continued escalating harassment, stalking, and possible physical violence.  
24 He recently posted a social media comment asking another individual if they believe in the  
25 Second Amendment. He has referred to a “political hit list,” which he believes he is on.  
26 County Defendants have no knowledge of or involvement with any creation of such a list,  
27 yet Ribar continues to communicate with defense counsel and the LBOT about it. Last

1 week, he informed the LBOT that he believes there are people “killing some conservatives”  
2 and “it’s happening in our community...” Commenters on one of Ribar’s recent YouTube  
3 posts refer to (presumably the firearms provision of) the Second Amendment, as a “fix” for  
4 Ribar’s grievances, and another encouraging use for “self protection.” Further displaying  
5 escalation, Ribar recently replied to a social media comment, asking another person, “do  
6 you believe in the 2nd Amendment.” There is serious concern for the safety and well-being  
7 of the individuals involved in this case, including counsel.

8 This Court’s intervention is necessary for the fair administration of justice. Ribar’s  
9 behavior indeed continues to escalate, despite the current pending motions for a restraining  
10 order (which were not filed on an emergency basis). Now, because of Ribar’s escalation, an  
11 emergency filing is necessary. Counsel and parties should not be forced to experience the  
12 fear, harassment, and anguish that comes with Ribar’s alarming behavior simply because  
13 they are involuntarily involved in the instant case.

14 County Defendants request that the Court use its inherent power as set forth below  
15 to enjoin the harassment and intimidation that has developed in this case toward counsel  
16 and parties. In addition to the relief that Build Our Center requests, County Defendants  
17 respectfully request the following restraining order to address County Defendants and its  
18 counsels:

- 19 1. Ribar should be enjoined, restrained and prohibited from  
20 physically approaching (not to come within six hundred feet  
(600’)), speaking with, or sending any type of written  
21 communication (including on any social media platform) to  
the Library or any Library employee except if attending a  
22 publicly noticed open meeting pursuant to NRS Chapter 241,  
or if present at a Library branch for purposes of an emergency  
evacuation.
- 23 2. Ribar should be enjoined, restrained and prohibited from  
24 physically approaching (not to come within six hundred feet  
(600’)) County Defendants’ counsel or any employee of the  
25 Washoe County District Attorney’s Office except for  
attending a hearing in this case.
- 26 3. Ribar should be enjoined, restrained and prohibited from  
27 physically entering the Washoe County District Attorney’s  
Office (1 S. Sierra Street, 4th Floor, Reno, NV 89501), and

1 from physically entering the staff parking lot, which has a  
2 secure entrance gate but lacks a secure gated perimeter  
3 (located at or about 76 Court Street, Reno, NV 89501,  
Assessor Parcel Numbers 011-165-01, 011-165-02, 011-165-  
03, 011-165-04, 011-165-18, 011-165-23, 011-165-21).

- 4 4. While attending a Library Board of Trustees meeting, whether  
before, during, or after, Ribar shall not harass, threaten,  
intimidate, or follow any person, including the appointed  
Trustees, Library staff, and members of the public. If during  
an LBOT meeting, a Trustee ejects Ribar for behavior that  
disrupts the forum, Ribar shall be required to immediately  
remove himself from the premises.
- 5 5. Ribar shall not direct any public records requests to County  
Defendants' counsel and instead must use the Washoe  
County online public records portal.
- 6 6. Ribar should be enjoined, restrained, and prohibited from  
continuing to post content from or regarding this case, any  
defendant, or any witness on any social media page, including  
but not limited to: YouTube, Facebook, Instagram, LinkedIn,  
Twitter/X, Truth Social, and TikTok. Any content as to this  
litigation currently on any of his social media pages shall be  
removed immediately.
- 7 7. Ribar shall remove any and all direct or indirect references to  
Lindsay Liddell, "Liddell," "DDA Liddell," etc., on any  
social media account that he operates, including but not  
limited to YouTube, Facebook, Instagram, Twitter/X, and  
TikTok, and including but not limited to his usernames of  
"Auditing Reno 911," "auditreno911," "Ribar for Nevada,"  
"Ribar4Nevada," and "Equal Justice."
- 8 8. Any hearings in this case should be held remotely, unless the  
Court deems in-person hearings necessary.
- 9 9. The restraining order should remain in effect during the  
pendency of this case, including through any appeals Ribar  
may file.

## 22 II. MEET AND CONFER

23 Pursuant to LR 7-4, counsel attempted to meet and confer with Ribar. *See* (ECF No.  
24 168 at pp. 5–6); Ex. 1 at ¶3. The Court previously entered a Minute Order prohibiting Ribar  
25 from recording meet and confers with defense counsel in this case. (ECF No. 89 at p. 2, lns.  
26 9–10). The Order followed concerns that Ribar is using this case for social media content.  
27 (ECF No. 64 pp. 3–4). Ribar indicated his intent to violate the Court's Order and record

1 any call to meet and confer with County Defendants' counsel. Despite being provided with  
 2 a copy of the Court's order, and being reminded that he was prohibited from recording,  
 3 Ribar demanded that he record any meet and confer. *See* (ECF No. 168 at pp. 8, 12, 16, 19).  
 4 As such, counsel was unable to complete a meet and confer via telephone with Ribar.

5 Defendant Build Our Center was notified of the instant Motion and does not object  
 6 to its filing. (ECF No. 168 at p. 13); Ex. 1 at ¶3.

### 7 III. PLAINTIFF DREW RIBAR'S ESCALATING HARASSMENT

8 Ribar operates a YouTube Channel with over 30,000 subscribers on which he  
 9 primarily posts videos of his activities filming and antagonizing government employees for  
 10 their click-bait reactions.<sup>1</sup> In the past, Ribar's harassing videos led to doxxing and direct  
 11 harassment of County Defendants. *See* (ECF No. 64). Ribar is aware of this, because it was  
 12 directly litigated in the instant case and gave rise to a protective order and an order  
 13 prohibiting the recording of depositions. *See id.*; (ECF Nos. 89, 98). Despite this  
 14 information, Ribar has continued to post about the Defendants, defense counsel, individuals  
 15 associated with Defendants, and the instant litigation.

16 In August 2025, Ribar posted a video attacking County Defendants' counsel, Deputy  
 17 District Attorney Lindsay Liddell.<sup>2</sup> *See* Ex. 2. He asks his viewers, "WANT TO SEE  
 18 ATTORNEY LIDDELL LIE IN A COURT DOCUMENT??" *Id.* at p. 1. He then provides  
 19 an excerpt from a filing in this case, saying "WHY LIE??,"<sup>3</sup> and inviting his viewers to  
 20

21 <sup>1</sup> *See* <https://www.youtube.com/@auditingreno911> (last visited Oct. 27, 2025).

22 <sup>2</sup> The video appears to have since been removed from Ribar's channel, presumably for  
 23 violating the YouTube terms of service, but County Defendants are unaware of the specific  
 24 circumstances that led to its removal.

25 <sup>3</sup> The "lie" of which Ribar accuses undersigned counsel is based on County Defendants'  
 26 description of his camera equipment as a "bulky tripod." Apparently, Ribar's camera  
 27 attachment is technically termed a "gimbal," which has many features including a built-in  
 tripod. It is a distinction without a difference.

1 “ASK HER AT LLIDDELL@DA.WASHOECOUNTY.GOV.” *Id.* at p. 2. Ribar posted  
 2 another video of a campaign event for Washoe County District Attorney Christopher Hicks,  
 3 which Ribar attended and attempted to antagonize DA Hicks.<sup>4</sup> *See* Ex. 3. In the video, he  
 4 asks DA Hicks in front of several attendees, “...one of your attorneys, Lindsay Liddell in  
 5 one of her documents lied to the Court...” *Id.*

6 As Defendant Build Our Center’s Motion describes, on September 6, 2025, Ribar  
 7 attempted to attend a private Pride festival event, but apparently was not permitted to do  
 8 so. Since then, Ribar’s harassment and inappropriate conduct substantially escalated. Build  
 9 Our Center’s Motion describes the many emails to defense counsels and others, the baseless  
 10 demands, and inappropriate behavior. (ECF No. 130 at pp. 7–14). Ribar’s behavior  
 11 continues to escalate.

12 On September 10, 2025, presumably using Nevada public records laws as a weapon,  
 13 Ribar submitted a frivolous public records request to undersigned counsel and Reno City  
 14 Attorney Karl Hall. Ex. 4. Ribar is well aware of the laws governing public records requests,  
 15 including that it requires any public employee recipient to respond within five business days  
 16 regardless of whether they have control or custody of the requested records. *See* NRS  
 17 239.0107(1). In submitting this request for records, which he presumably knows are not in  
 18 undersigned counsel’s custody, he inappropriately consumed undersigned counsel’s time  
 19 and resources in requiring her to respond and inform him of what he presumably already  
 20 knew. *See* Ex. 4. This frivolous public records request is another example of Ribar harassing  
 21 and oppressing counsel in this case.

22 On September 16, 2025, Ribar posted a video of his harassing contact with a Build  
 23 Our Center volunteer, YeVonne Allen, at her workplace, Truckee Meadows Community  
 24 College.<sup>5</sup> *See* Ex. 5. Despite history of his harassment and victims experiencing doxxing,  
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26 <sup>4</sup> *See* <https://www.youtube.com/watch?v=pLQw685lphg> (last visited Sept. 22, 2025).

27 <sup>5</sup> *See* <https://www.youtube.com/watch?v=VRRFzhlEtvE> (last visited September 19, 2025).

1 Ribar posted live feed video to his YouTube channel displaying Ms. Allen's personal  
 2 FaceBook page. *Id.* at p. 1. Even more alarming, Ribar then guided his viewers to the  
 3 "relationship" section of Ms. Allen's personal account, and then to Ms. Allen's fiancé's  
 4 personal FaceBook account, a private person who has no relation to Ribar or the instant  
 5 case. *Id.* at pp. 1–2. He then announced and displayed the full name and workplace of Ms.  
 6 Allen's fiancé. *Id.* at p. 2. Ribar's harassment and oppression of Ms. Allen and her fiancé  
 7 demonstrates dangerous escalation into the private lives of his targets and is very unsettling.

8       Around midnight, early into September 17, 2025, Ribar emailed undersigned counsel  
 9 and the employer of Build Our Center's counsel, with the subject line "Do not lie to me."  
 10 and containing a video link. Ex. 6 at pp. 2–3. Undersigned counsel responded, stating it  
 11 appeared to be another false accusation of lying, and that it was unclear what connection  
 12 exists between Washoe County or the Library and the September 2025 private Pride event.  
 13 *Id.* at p. 2. In response, Ribar continued to accuse defense counsel of lying. *Id.* at p. 1.

14       In the evening of September 17, 2025, Ribar attended a Library Board of Trustees  
 15 ("LBOT") meeting where he displayed grossly inappropriate behavior.<sup>6</sup> *See* Ex. 7; Ex. 8;  
 16 Ex. 9. Before the meeting started, he handed photocopies of the purported Pride event  
 17 "banned list," to the LBOT Trustees. Ex. 7 at ¶3. When handing it to one of the appointed  
 18 LBOT Trustees, he aggressively called her a "fucking communist."<sup>7</sup> *Id.*; Ex. 8 at p. 1. Shortly  
 19 after, Ribar sarcastically announced, "I might be a little angry." Ex. 8 at p. 2. During the  
 20 initial public comment period, Ribar refused to comply with the LBOT's rules of decorum  
 21 and forced the meeting to briefly recess while Ribar was verbally combative with the LBOT.  
 22 Ex. 7 at ¶4. In the last public comment period, Ribar claimed to be on a "political hit list,"  
 23

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24       <sup>6</sup> *See also*, Ribar's version of the events posted to his YouTube Channel at  
 25 <https://www.youtube.com/watch?v=lUxGnnouOrc> (last visited Sept. 22, 2025).

26       <sup>7</sup> *See note 5 supra* at timestamp 4:49–4:53. (Ribar setting a paper in front of LBOT Trustee  
 27 Rodriguez, and saying "I'm sure you like that you fucking communist.").

1 and discussed “killing some conservatives.” *Id.* at ¶5; Ex. 8 at p. 3; Ex. 9. On Ribar’s  
 2 corresponding YouTube video, one of his viewers commented that it was “nothing 2A [the  
 3 second amendment] cant fix...” Ex. 8 at p. 6. Another comment on the same video states  
 4 “The left are extremely violent. I would recommend all persons not democrat extremists to  
 5 excersize [sic] their 2nd ammendment [sic] for self protection.” *Id.* These comments are  
 6 alarming and appear to encourage Ribar or others to deploy physical violence in addition  
 7 to the harassment toward those involved in this case or visiting the Library.

8 Also during the September 17, 2025, LBOT meeting, Ribar harassed members of the  
 9 public. *See* Ex. 8 at pp. 4–6. Two young people who are, to Defendants’ knowledge,  
 10 unaffiliated with any defendant in this case, were in the crowd filming the meeting and Ribar  
 11 for a “movie.” They spoke with thick German accents, were comical characters in theatrical  
 12 wardrobe, and nonetheless have just as much right to be present for the LBOT meeting as  
 13 Ribar does. At the end of the meeting, Ribar followed these young adults outside, and  
 14 attempted to follow them to their vehicle.<sup>8</sup> *See* Ex. 8 at pp. 4–6. One of them told Ribar, “I  
 15 feel threatened by you right now, sir.” *Id.* at 4. Ribar continued to follow them and told the  
 16 young man, “I’m just going to get your license plate.” *Id.* at p. 5. Ribar’s behavior  
 17 demonstrated escalating aggression toward members of the public at the Library.

18 On September 19, 2025, Ribar posted a video of his visit to the workplace (University  
 19 of Nevada, Reno) of Dr. Allen Ratliff, a Build Our Center board member. *See* Ex. 10. In the  
 20 video, the school Dean explained to Ribar that Dr. Ratliff’s conduct on Dr. Ratliff’s own  
 21 time “has nothing to do with the school of social work.” *Id.* Ribar argued with her, claiming  
 22 that because Dr. Ratliff earns his wages from a tax-payer-funded employer, what he does in  
 23 his free time is subject to inquiry. *See id.* This is concerning and demonstrates Ribar’s  
 24 escalation and incorrect belief that he is entitled to interfere with individuals’ private lives  
 25 simply because they are government employees. *See id.*

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26  
 27<sup>8</sup> *See* note 5 *supra* at timestamp 34:52–39:28.

1       Furthering his unsettling behavior, despite Build Our Center's Motion filed  
 2 Thursday September 18, 2025, outlining the safety concerns and harassment from Ribar,  
 3 Ribar has continued to post defamatory content regarding their counsel. *See* Ex. 11. On or  
 4 about September 20, 2025, Ribar posted another YouTube video centered on attacking Ms.  
 5 Kertis titled "LYING ATTORNEY CAUGHT RED HANDED." *Id.* at p. 1. Thereafter,  
 6 Ribar posted the video to "X"/Twitter and engaged in a dispute with a Nevada journalist  
 7 stating "Check out LYING attorney Alison Kertis" with a link to his video. *Id.* at p. 2. That  
 8 same day, he also posted a video along with words stating, "Attn. Lindsey Liddell, Washoe  
 9 County's attorney, is accused of interfering with a political candidate." Ex. 12 at p. 1.

10      Despite defense counsels filing respective motions for restraining orders to address  
 11 Ribar's behavior, it only continues to escalate. *See* (ECF Nos. 130, 140). Ex. 1; Ex. 12; Ex.  
 12 13; Ex. 14. Ribar did not remove defamatory content, or content that could lead to potential  
 13 doxxing of Defendant Build Our Center's representatives. After Ribar posted identifying  
 14 contact information, Dr. Ratliff received an alarming voicemail from an individual claiming  
 15 to be an attorney named "Peter Truman," stating he specializes in suing "public idiots, of  
 16 which you are now one," and threatening to "take everything you have- your position at uh  
 17 college, your retirement, your real estate, your vehicles. So sir, be prepared to lose that  
 18 all...We will be there this coming Wednesday of the week. We will hunt you down. We  
 19 have a subpoena for you...You have the night you deserve, Mr. Ratliff." (ECF Nos. 161-1,  
 20 162)

21      On October 15, 2025, the parties attended a hearing in this case. Ex. 1 at ¶8. Given  
 22 Ribar's recent harassment, when the hearing concluded, defense counsels raced to the  
 23 women's restroom hoping to allow Ribar sufficient time to exit and avoid unwanted  
 24 confrontation. *Id.* When counsels attempted to exit a few minutes later, Ribar was on this  
 25 Court's pavement next to the rotunda filming himself. *Id.* As counsels exited, Build Our  
 26 Center's counsel Ms. Kertis walked past Ribar who immediately began shouting at her,  
 27 stating something to the effect of "ALLISON! DO YOU ALWAYS LIE TO JUDGES IN

1 COURT?" *Id.* Undersigned counsel panicked and swiftly walked away, hiding behind a  
 2 utility box at the crosswalk to avoid Ribar's line of sight and avoid harassment toward her.  
 3 *Id.* The interaction caused substantial distress and disrupted her ability to work on other  
 4 matters. *Id.*

5 Ribar also obtained, without authority, an attorney-client privileged email sent by  
 6 undersigned counsel to her clients regarding his harassment. Ex. 1 at ¶9. He refused to  
 7 disclose how he obtained the email and continues to use it to perpetuate harassment of  
 8 defense counsel. *See* (ECF No. 141 at p. 63, 142 at p. 63, 143 at p. 63) (reflecting an email  
 9 from undersigned counsel with the subject line "\*confidential attorney-client privileged\*  
 10 Ribar lawsuit."); (ECF No. 160 at pp. 5–8); (ECF No. 166 at pp. 5–6); Ex. 12 at p. 2; Ex.  
 11 13 at pp. 1–4, 5–6, 10; He sent the attorney-client privileged email to a local political gossip  
 12 blog, Picon Press, which published a story about it, amplifying his harassing tactics.<sup>9</sup> Ex. 13  
 13 at p. 10.

14 Ribar continues to post defamatory content about defense counsels and about this  
 15 case on social media. *See* Exs. 12, 13, 14. On October 22, 2025, he posted a video in front  
 16 of undersigned counsel's office building in which he proclaims, "...never trust the district  
 17 attorney because they might send out emails where they lie to you. And then the guy dealing  
 18 with it might get copies of it."<sup>10</sup> Ex. 14 at pp. 1–5. Ribar appears to be taunting undersigned  
 19 counsel and displaying his perceived power in obtaining her confidential and privileged  
 20 email.

21 That same day, Wednesday, October 22, 2025, Ribar attended a State Court hearing  
 22 in a criminal case where he pestered the prosecutor. *See* Ex. 1 at ¶10. Ribar attempted to ask  
 23 the prosecutor (undersigned counsel's coworker) several questions, despite the prosecutor

25 <sup>9</sup> "When Power Can't Take Pushback," [https://www.piconpress.com/documents/when-](https://www.piconpress.com/documents/when-power-cant-take-pushback)  
 26 [power-cant-take-pushback](https://www.piconpress.com/documents/when-power-cant-take-pushback) (last visited Oct. 28, 2025).

27 <sup>10</sup> *See also* <https://www.youtube.com/watch?v=jWRHmCZ9b0o> (last visited Oct. 29,  
 2025).

1 stating he did not wish to speak with him. *Id.* Ribar asked the prosecutor something like,  
 2 “Are you trying to silence the First Amendment like Lindsay Liddell?” *Id.* Undersigned  
 3 counsel learned that Ribar was outside her office building. *Id.* Unfortunately, undersigned  
 4 counsel was present working in the office that day. *Id.* Ribar’s lingering presence outside the  
 5 office caused substantial distress and panic. *Id.* She was unable to complete any substantive  
 6 work due to the high levels of anxiety it caused and was instead forced to engage in coping  
 7 mechanisms to avoid a panic attack. *Id.* Undersigned counsel did not feel safe leaving the  
 8 building to get to her vehicle until another staff member went outside to confirm that Ribar  
 9 had left the premises. *Id.*

10 On October 25, 2025, Ribar posted an alarming video regarding defense counsels in  
 11 this case and the above-mentioned prosecutor, using a photograph of undersigned counsel  
 12 he appears to have found online.<sup>11</sup> Ex. 14 at pp. 6–15. In it, Ribar displays the photograph,  
 13 stating undersigned counsel’s name, stating “she’s got quite a history actually on her.” *Id.*  
 14 at p. 8. Talking to his audience, Ribar states, “...So what I found on Miss Liddell is she likes  
 15 to make stuff up...”<sup>12</sup> *Id.* at p. 9. He continued to taunt undersigned counsel, using an  
 16 aggressive tone to state “If I’m libeling, sue me. Lindsay Liddell, you have lied. I’m proving  
 17 it.”<sup>13</sup> *Id.* at p. 11. He proclaimed that undersigned counsel is “the epitome of government  
 18 corruption.” *Id.* at p. 13. He then taunted Defendant Build Our Center’s counsel, again in  
 19 an aggressive tone, stating, “Hey, Allison, if I’m libeling you, sue me.”<sup>14</sup> *Id.* at p. 14. Ribar

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21 <sup>11</sup> “Lying Lawyers??? No!! Can it be True??,”  
 22 <https://www.youtube.com/watch?v=av3IXzhzCuw> (Oct. 28, 2025).

23 <sup>12</sup> See note 11 *supra* at timestamp 5:44; see also *id.* at timestamp 34:45 (Ribar stating, “you  
 24 fucking liars, you lied to the court, you perjured yourself, you fucked up”).

25 <sup>13</sup> See note 11 *supra* at timestamp 23:42; see also *id.* at timestamp 28:30 (Ribar claiming  
 26 “Lindsay Liddell wants to take away my ability to communicate with people... If I’m lying,  
 sue me for libel... [Liddell] insists on an undocumented meeting... but she’s afraid of me”).

27 .  
<sup>14</sup> See note 11 *supra* at timestamp 38:18.

1 also explained that in following people to their vehicles while filming, he “want[s] to get  
 2 your license plate so [he] can know who you are.”<sup>15</sup> *Id.* at p. 10.

3 Ribar is also currently on a defamatory social media campaign against undersigned  
 4 counsel, including posting the following:<sup>16</sup>

- 5 • On a District Attorney’s Office Facebook post about a dog training video,  
     6 Ribar commented, “Was the dog searching for Lindsay Liddell’s lies to her  
     7 clients about me [pondering emoji] [pondering emoji].” Ex. 13 at p. 1;
- 8 • On District Attorney’s Office Facebook post about Domestic Violence  
     9 Awareness Month, Ribar commented asking District Attorney Christopher  
     10 Hicks (“DA Hicks”) “why did your Deputy DA Lindsay Liddell lie about me  
     11 to her clients??,” then tagging Washoe County Commissioner Chair Alexis  
     12 Hill to put “this issue” on a board agenda, “Or do you support corrupt  
     13 government [emoji].” *Id.* at p. 2;
- 14 • On District Attorney’s Office Facebook post, Ribar commented with a photo  
     15 of undersigned counsel’s attorney-client privileged email, stating “...Check  
     16 out this email that was sent to their clients LYING about me!!...” *Id.* at p. 3;
- 17 • On District Attorney’s Office Facebook post, Ribar commented that DA  
     18 Hicks “allows (perhaps encourages [pondering emoji]) his Deputy DA  
     19 Lindsay Liddell to LIE about me to his clients and to mislead the court...”  
     20 and included a copy of the attorney-client privileged email. *Id.* at p. 4;
- 21 • On a March 2024 post from the District Attorney’s Office’s X/Twitter about  
     22 undersigned counsel, Ribar on or about October 25, 2025, replied asking if it  
     23 was a pattern and practice for its “attorneys to lie to clients and misrepresent

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25  
 26<sup>15</sup> See note 11 *supra* at timestamp 10:32.  
 27<sup>16</sup> It has been difficult to keep up with the volume of Ribar’s defamatory social media posts  
     and comments, and those identified here reflect those that undersigned counsel’s has seen  
     online.

1 non factual things to the courts [pondering emoji]," and including a link to  
2 his recent YouTube video defaming counsels. *Id.* at p. 5;

- 3 • On Washoe County Commissioner Alexis Hill's FaceBook post, Ribar  
4 commented to her, "...Do you believe lying Washoe County District  
5 Attorney's Office Deputy DA Lindsay Liddell should be fired [pondering  
6 emoji] Why would she lie to Washoe County Nevada- Government  
7 employees about me in this email??," and included a copy of the attorney-  
8 client privileged email from undersigned counsel to clients. *Id.* at p. 6;
- 9 • On one of Washoe County Commissioner Alexis Hill's FaceBook posts,  
10 Ribar responded to another person asking if they saw the email undersigned  
11 counsel wrote "to her clients where she lied about me?? Should lawyers lie  
12 [pondering emoji] Should our elected servants allow corruption [pondering  
13 emoji]." *Id.* at p. 7;
- 14 • Responding to the State Bar of Nevada's X/Twitter post about bar exam  
15 results, Ribar replied, "Will these new attorneys follow in their predecessors  
16 footsteps and be lying Nevada Bar Attorneys like Lindsay Liddell and Allison  
17 Kertis?? ... stay tuned bar complaints and videos coming soon." *Id.* at p. 9;
- 18 • Commenting on a local news blog, Picon Press, FaceBook post, Ribar  
19 including a copy of undersigned counsel's attorney-client privileged email  
20 and stated, "would you believe... Deputy DA lied about me in an email to  
21 her clients? Would you believe the DA office appears to be working hand in  
22 glove with Our Center attorney Alison Gansert Kertis..." *Id.* at p. 10;
- 23 • On the Nevada Attorney General Aaron Ford's X/Twitter post, Ribar replied  
24 with a video mentioning undersigned counsel and asked, "Will you prosecute  
25 attorneys that lie/commit perjury [pondering emoji] or do you support  
26 corrupt government [pondering emoji]" *Id.* at p. 11;

27 //

- 1     • Reply to a Las Vegas reporter's X/Twitter post, Ribar included a YouTube  
2       link stating "...Check out LYING attorney Alison Kertis" *Id.* at p. 13;
- 3     • On acting U.S. Attorney for the District of Nevada, Sigal Chattah's  
4       X/Twitter post, Ribar replied asking when she would investigate City of  
5       Reno and Defendant Build Our Center. *Id.* at p. 14.

6           On October 29, 2025, Ribar filed a bar complaint against defense counsels and filed  
7       the same in this case. (ECF No. 171). Ribar also emailed a copy of the baseless complaint  
8       to undersigned counsel's employer, DA Hicks. *See id.* at p. 10.

9           Like counsel for Build Our Center, undersigned counsel has suffered significant  
10      mental anguish resulting from Ribar's recent behavior. *See Ex. 1 at ¶¶4–8, ¶¶10–12.*  
11      Undersigned counsel has taken precautions to avoid Ribar's harassment, including not  
12      attending events or visiting Library branches where Ribar may be present, as well as  
13      precautionarily working from home, and carrying protection devices. *Id.* Undersigned  
14      counsel has recently been reluctant to leave home and is on high alert when in public. *Id.* at  
15      ¶11. Ribar's escalating, obsessive and alarming behavior has caused undersigned counsel to  
16      experience several panic attacks, which has disrupted her work and home life. *Id.* ¶¶12–13.  
17      Undersigned counsel has also experienced substantial disruption and inability to sleep,  
18      which only exacerbates the anxiety Ribar continues to cause daily. *Id.* at ¶12. Undersigned  
19      counsel was required to seek mental healthcare, now has high blood pressure, and received  
20      prescription medication as a result of the mental harm Ribar's behavior has caused her thus  
21      far. *Id.*

22           Ribar has shown no regard for the professional decorum that litigation mandates, no  
23      regard for personal boundaries, and continues to harass, oppress, and engage in threatening  
24      behavior, evoking fear from those involved. He has attempted to follow people to their  
25      vehicles and admits that it was an attempt to get a license plate so he can "know who [they]  
26      are." Ex. 14 at p. 10. Of note, on information and belief, Ribar owns a vehicle towing  
27      company that may give him access to a number of vehicles at any given time and access to

1 Department of Motor Vehicle databases. It is unclear whether Ribar has access to a database  
 2 that could provide the physical address of a person based on their license plate. This gives  
 3 rise to additional fear and distress that somehow Ribar may be able to locate home  
 4 addresses, even if they are confidential. Ex. 1 at ¶13.

5 **IV. LEGAL ARGUMENT**

6 **A. The Court Should Enter a Restraining Order to Protect County Defendants  
 7 and Their Counsel.**

8 “Courts may issue an injunction over conduct that is directly related to the lawsuit.”  
 9 *United Artists Corp. v. United Artist Studios LLC*, No. CV 19-828- MWF-MAAX, 2019 WL  
 10 6917918, at \*5 (C.D. Cal. Oct. 17, 2019) (enjoying party from “directly or indirectly making  
 11 any harassing or threatening communications to anyone connected with this lawsuit.”).  
 12 “[T]here is a strong precedent establishing the inherent power of federal courts to regulate  
 13 the activities of abusive litigants by imposing carefully tailored restrictions under the  
 14 appropriate circumstances.” *De Long v. Hennessey*, 912 F.2d 1144, 1147 (9th Cir. 1990). “[A]  
 15 district court has the inherent power to issue an injunction against litigants who harass their  
 16 opponents.” *Yates v. Belli Deli*, No. C07-01405 WHA, 2007 WL 2318923, at \*3 (N.D. Cal.  
 17 Aug. 13, 2007).

18 Whatever right a litigant may have to “publicly criticize Defendants’ counsel and the  
 19 court is subordinate to the public’s interest in the judiciary’s ability to make decisions  
 20 without fear of harassing and defamatory reprisal, as well as Defendants’ interest in  
 21 preserving their counsel from [plaintiff’s] harassment.” *Fredin v. Middlecamp*, No. 17-cv-  
 22 03058 (SRN/HB), 2020 WL 6867424, at \*7 (D. Minn. Nov. 23, 2020), *aff’d*, 855 F. App’x  
 23 314 (8th Cir. 2021). “[H]arassing speech is not protected speech.” *Doe v. Fitzgerald*, No. 2:20-  
 24 cv-10713-MWF-ROA, 2022 WL 423495, at \*4 (C.D. Cal. Feb. 2, 2022). [C]ourts routinely  
 25 grant TROs restricting speech that is not merely false, but defamatory.” *Recovery Hous. Acad.  
 26 LLC v. Candelario*, 562 F. Supp. 3d 333, 340 (D. Ariz. 2022).

27 //

1       One court issued a restraining order, which prohibited a party from (1) sending  
2 harassing or threatening emails to counsel, the opposing party, counsel's firm, and counsel's  
3 current or former colleagues, (2) posting threatening or harassing content about the opposing  
4 party's counsel or employees, (3) coming within 100 feet of the opposing party's officer or its  
5 counsel except when in court, coming within 100 feet of the opposing party's officer's  
6 residence or its counsel's office, and (4) directing others to do any of the foregoing acts on  
7 the party's behalf. *Beyond Blond Prods., LLC v. Heldman*, No. CV205581DSFGJSX, 2022 WL  
8 2784404, at \*8 (C.D. Cal. June 17, 2022). The Court also ordered the party to remove  
9 harassing content referencing the opposing party, its officer, its counsel, or its counsel's  
10 employees. *Id.* The Order followed a series of harassing emails to counsel, including that  
11 they need to be disbarred, using foul language with counsel, posting false and defamatory  
12 content about counsel online, and posting defamatory reviews of the opposing party's  
13 counsel. *See id.* at \*1–3. The Court noted that the conduct caused counsel to “suffer anxiety  
14 and distress over his personal safety,” and impacted his professional reputation.” *Id.* at \*5.  
15 In finding that the restraining order would be in the public interest to ensure the fair  
16 administration of justice, the Court found that it will ensure the opposing party and counsel  
17 “can fully participate in this lawsuit without the fear of receiving harassing communications  
18 from [the other party].” *Id.* at \*6.

19       As the Court explained in *Beyond Blonds*, restraining orders of this nature look first to  
20 the “likelihood of success on the merits of showing harassment, rather than the merits of the  
21 underlying lawsuits.” 2022 WL 2784404 at \*5. The Court looks to relevant statute regarding  
22 harassment, including applicable state law. *See id.* The Court then looks at whether the  
23 moving party is likely to suffer irreparable harm from the harassment. *Id.* at \*6. The Court  
24 then balances the hardships and public interest. *Id.*

25       In Nevada, a person is guilty of harassment where the person knowingly threatens to  
26 do any act intended to substantially harm the person threatened with respect to their mental  
27 health or safety. NRS 200.571 (1)(a)(4). A person is guilty of stalking who willfully or

1 maliciously engages in a course of conduct directed toward a victim that would cause a  
2 reasonable person under similar circumstances to feel terrorized, frightened, intimidated,  
3 harassed or fearful for their immediate safety and actually causes the victim to feel as such.  
4 NRS 200.575 (1). The crime of libel exists with malicious defamation “to impeach the  
5 honesty, integrity, virtue, or reputation [of a person], and thereby to expose them to public  
6 hatred, contempt or ridicule.” NRS 200.510 (1). Under federal law, the crime of stalking  
7 exists when a person uses an interactive computer service with the intent to harass, or  
8 intimidate another person to cause, attempt to cause, or would be reasonably expected to  
9 cause substantial emotional distress to another person. 18 U.S.C.A. § 2261A (2).

10 Here, the Court should issue a restraining order on an emergency basis, ideally as  
11 soon as possible. Ribar’s behavior has not resulted in the mere stress or annoyance that  
12 comes with normal litigation from time to time. As set forth above, Ribar is terrorizing  
13 counsel, and inhibiting counsel’s ability to fully and fairly participate in the instant case. His  
14 behavior has and continues to irreparably harm and damage counsel’s reputation, has  
15 caused substantial psychological harm, and resulting fear from Ribar’s harassing and  
16 intimidating conduct. Ex. 1 at ¶¶4–13.

17 Ribar has continued to engage in inappropriate conduct designed to harass counsel  
18 and defendants, and a restraining order is appropriate to protect the parties, counsel, and  
19 witnesses. There is a documented continuous and escalating pattern of Ribar’s litigation-  
20 adjacent harassment and intimidation. Exs. 1–14. Ribar has recently turned to personalized  
21 attacks of counsel, appearing at workplaces, at her workplace and amplifying his social  
22 media campaigns attempting to discredit, intimate, and defame defense counsels. *See* (ECF  
23 No. 130); Ex. 1 at ¶10; Ex. 3; Ex. 11; Ex. 12; Ex. 13; Ex. 14. Ribar’s behavior has now  
24 made the courthouse feel unsafe to counsel after shouting at Ms. Kertis following a hearing  
25 in this case. *See* Ex. 1 at ¶8. In doing so, Ribar demonstrated an inability to control his  
26 emotions and behavior. *See id.* Undersigned counsel hid behind a utility box near the  
27 //

1 crosswalk to avoid Ribar. *Id.* The Court should not permit a pro se litigant to harass  
2 attorneys in this District and make them fear for their personal safety.

3 In addition, Ribar has engaged in in-person intimidation, going to the workplaces of  
4 witnesses/Build Our Center representatives, lingering outside the building of undersigned  
5 counsel's office, and using profanity in telling a LBOT Trustee she is a "fucking  
6 communist." *See* (ECF No. 130); Ex. 1 at ¶10; Ex. 3; Ex. 11. His behavior at the recent  
7 LBOT meeting disrupted the course of business and made attendees feel threatened when  
8 he tried to follow them to their vehicle. Exs. 7, 8 at p. 4. This behavior is entirely  
9 inappropriate and interferes with the Library's ability to conduct its business and disrupts  
10 the public's ability to safely and securely participate in LBOT's public meetings. *See id.* Ribar  
11 continues to use the instant case as a launchpad for his monetized YouTube channel as well  
12 as to further his harassment and antagonism to individuals he believes have any relation to  
13 the case or the defendants. *See* (ECF No. 130); Exs. 1–14.

14 Undersigned counsel's only connection or involvement with Ribar is that she is  
15 representing the County Defendants in this case. Ex. 1 at ¶14. There is no reasonable basis  
16 for Ribar's abhorrent fear-inducing behavior toward counsel. The Court should not have  
17 any patience nor tolerance for patently harassing, vexatious, defamatory, and contumacious  
18 behavior by any litigant against another party or their counsel.

19 Any interest Ribar may have in his disruptive, harassing, defamatory, and  
20 threatening behavior is heavily outweighed by the defendants' and counsels' interest in  
21 avoiding harassment, defamation, intimidation, and disruption. Likewise, there is a public  
22 interest in the Library's ability to carry out its services to the community at large. *See Kreimer*  
23 *v. Bureau of Police for Town of Morristown*, 958 F.2d 1242, 1255 (3d Cir. 1992). Contrary to  
24 Ribar's belief, an individual's status as a public employee does not grant any person the right  
25 to stalk, harass, intimidate, dox or expose them or their families, or otherwise interfere with  
26 their private lives. *See* Ex. 10. Ribar exhibits a pattern of abuse to gain power and control  
27 over his victims, including testing boundaries with physical and self-instigated

1 confrontations, using his platforms and followers as a force multiplier, engaging in  
 2 reputational coercion to disenchanted counsel and pressure a favorable outcome, asserting  
 3 dominance through public displays and antagonism, reversing the victim/offender role to  
 4 justify his own escalation, and using public processes not to resolve disputes or gain records  
 5 but to extract leverage over his victims. This behavior should not be tolerated.

6 Defendants should not have to wait until Ribar's behavior escalates into even more  
 7 unwanted confrontations, more personal attacks or invasions of privacy, doxxing from his  
 8 followers, or even physical violence from him or his followers. Ribar already has a  
 9 documented history of violating boundaries, such as when he pulled open a door to a closed  
 10 building that caused injury to a Library staff member. *See* (ECF Nos. 99-22 at 1:09:09–12;  
 11 99-26 at ¶8; 99-27; 99-28.). He has a history of verbal aggression, and inciting confrontations  
 12 with government employees. *Id.*; *see also* (ECF Nos. 99-2; 99-3; 99-8; 99-12 at 0:27:27–36.,  
 13 0:32:41–37:00, 0:52:11–53:18, 0:57:33–59:11, 1:15:00–16:21, 1:21:29–22:49; 99-22 at  
 14 0:13:29–14:34, 0:16:29–29:09, 0:51:02–12, 1:09:05–1:13:13; 99-23; 99-24 at pp. 8–12; 99-  
 15 25; 99-40 at 0:01:38, 0:18:01–21:09; 99-41). Now, Ribar is going to involved parties'  
 16 workplaces looking for confrontation, displaying information regarding an unrelated  
 17 fiancé's name and workplace, using profanity to trigger an LBOT Trustee, and aggressively  
 18 asserting he is "a little angry." Ex. 1 at ¶10; Exs. 5, 7, 8, 10. Moreover, Ribar's newly  
 19 expressed beliefs are alarming, including the potentially paranoid delusion that he is on  
 20 some kind of "hit list" (Ex. 8), and that people are "killing some conservatives" (Ex. 7 at p.  
 21 3), stating he "think[s] that's happening in our community too."<sup>17</sup> More recently, Ribar  
 22 directly asked another person if they believe in the Second Amendment. Ex. 13 at p. 8.  
 23 There is a real and articulable risk that Ribar will use this persecution narrative as  
 24 justification, in his mind, for increased stalking, unwanted contacts, and possibly physical  
 25 violence.

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<sup>17</sup> See <https://www.youtube.com/live/MyMqsO1JXRo?feature=shared&t=5857>.

1       The Court should enter a carefully tailored protected order to address the specific  
2 threats posed by Ribar. Ribar should be restrained from physically approaching or sending  
3 any communication to the Library or any of its employees unless it is for a public open  
4 meeting or he is required to use the Library for emergency evacuation purposes. He should  
5 be restrained from physically approaching defense counsel, or any employee of the Washoe  
6 County District Attorney's Office except when attending in-person hearings for this instant  
7 case, and this case alone. Ribar should be restrained from physically entering County  
8 Defendants' counsel's staff parking lot, which has an entrance gate but does not have a  
9 secure perimeter. If Ribar attends any LBOT meeting, he should not be permitted to harass,  
10 threaten, intimidate, or follow any person before, during, or after the meeting. This avoids  
11 further oppression with the Library's ability to conduct its business. Likewise, if during a  
12 meeting, a Trustee ejects Ribar for behavior that disrupts the forum, Ribar shall be required  
13 to immediately remove himself from the premises. Ribar should be restrained from  
14 submitting public records requests to County Defendants' counsel and should instead be  
15 required to use Washoe County's online request portal. Ribar should be restrained from  
16 posting content on social media about this case, including information, photos or videos of  
17 any defendant, or any witness, because he has demonstrated that the purpose of his posts is  
18 to harass specific individuals associated with this case or with defendants. He should  
19 likewise be required to remove any reference to DDA Lindsay Liddell, and any iteration  
20 thereof, from any social media account that he controls. He should not be permitted to use  
21 any other person, directly or indirectly, to perform any of the conduct described above. To  
22 ensure the fair administration of justice in this case, any restraining order should remain in  
23 effect during the pendency of this case, including through any appeals Ribar may file.

24       Additionally, given Ribar's inappropriate behavior at the courthouse, the Court  
25 should hold future hearings remotely unless in-person hearings are deemed necessary by the  
26 Court. Counsel should not be subjected to Ribar shouting at any person, including them,  
27 while entering or exiting a hearing in this case. Because Ribar has demonstrated that he does

1 not respect the decorum of this courthouse and cannot control his behavior, in-person  
2 hearings should be avoided in this case to protect counsel and potential escalation toward  
3 court staff.

4 **V. CONCLUSION**

5 This case is not a platform for Ribar's power-and-control tactics against the  
6 Defendants, witnesses, and defense counsel. A restraining order is necessary to safeguard  
7 the orderly administration of this case, and to ensure that counsels can fully, safely, and  
8 fairly participate in this case. County Defendants seek a carefully tailored restraining order  
9 to address Ribar's obsessively threatening, harassing, defamatory, intimidating, stalking,  
10 and oppressing behavior. Ribar's actions demonstrate irreparable harm which tips the  
11 equities toward protecting the safety and order of all individuals involved in this case.

12 Dated this 29th day of October, 2025.

13 By /s/ Lindsay L. Liddell  
14 LINDSAY L. LIDDELL  
15 Deputy District Attorney  
COBI BURNETT  
Deputy District Attorney

16 ATTORNEYS FOR WASHOE COUNTY  
17 DEFENDANTS

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1                   **CERTIFICATE OF SERVICE**

2                   Pursuant to FRCP 5(b), I certify that I am an employee of the Office of the District  
3 Attorney of Washoe County, over the age of 21 years and not a party to nor interested in the  
4 within action. I certify that on this date, I deposited for mailing in the U.S. Mails, with  
5 postage fully prepaid, a true and correct copy of the foregoing document in an envelope  
6 addressed to the following:

7                   DREW RIBAR  
8                   3480 PERSHING LANE  
9                   WASHOE VALLEY, NV 89704

10                  I certify that on this date, the foregoing was electronically filed with the United States  
11 District Court. Electronic service of the foregoing document shall be made in accordance  
12 with the Master Service List as follows:

13                  ALISON R. KERTIS, ESQ.

14                  Dated this 29th day of October, 2025.

15                  \_\_\_\_\_  
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27                  \_\_\_\_\_  
                      /s/ S. Haldeman  
                      S. Haldeman

## **INDEX OF EXHIBITS**

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